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U.S. Environmental Protection Agency
CERCLA Docket Office, Mail Code 5201G
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Washington D.C. 20460

via Overnite Express

Re: Comments on Proposed Listing on the National Priorities List
Evergreen Manor TCE Groundwater Contamination Site, Winnebago County, IL
63 Fed. Reg. 40,247 (July 28, 1998)

Dear Sir/Madam:

I. Introduction.

This letter provides Ecolab Inc.'s (Ecolab) Comments on the proposed listing of the Evergreen Manor TCE site on the National Priorities List (NPL) published in 63 Fed. Reg. 40,247 (July 28, 1998). Ecolab understands that the Comment period closes on October 13, 1998 (October 12 being a holiday). Although Ecolab bears no legal responsibility for the trichloroethylene (TCE) and other volatile organic compound (VOC) contamination identified by the Illinois Environmental Protection Agency, Ecolab submits these Comments to correct errors in the Illinois EPA's referral package that forms the basis for the U.S. Environmental Protection Agency's (EPA or Agency) administrative record and to address errors and omissions in the administrative process.

At the outset, Ecolab notes that TCE is the contaminant of concern identified by the Illinois EPA at the Evergreen Manor residential area approximately 1-2 miles southwest of Ecolab's property located on Rockton Road, Roscoe Township, Winnebago County, Illinois. To our knowledge, TCE has never been used at the Ecolab property. Ecolab simply did not cause or contribute to the TCE contamination in question. Thus, the record should be clear that Ecolab is not a potentially responsible party.

For the reasons discussed below, Ecolab respectfully requests that the Agency refrain from listing the Evergreen Manor TCE site on the NPL. If the Agency proceeds with the NPL listing process, the proposed site definition should not include the property owned by Ecolab approximately 1-2 miles northeast of the Evergreen Manor residential area.

II. The Proposed Site Definition Is Overbroad.

The Agency's July 28, 1998 NPL proposal begins by noting that the NPL is a list of national priorities among the known or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States. Although the NPL proposal suggests that the listing process is not intended to define the boundaries of facilities or releases, the Agency's site file from Illinois EPA's referral package includes a figure suggesting that the proposed site extends northeast beyond Rockton Road and describes the proposed site in section 2.2 as "approximately 2.25 miles long and 0.2 miles wide." Because the TCE "plume" does not exist on Ecolab's property, however, it would be arbitrary and capricious for the Agency to define the areal extent of the "plume" and the proposed site to include Ecolab's property.

Instead, the proposed site definition, if the site is listed, should be limited to the area where the relevant hazardous substance -- TCE -- is located at levels above Observable Release Criteria. The sampling data demonstrates that TCE alone is the relevant contaminant of concern. Based on publicly available results from water samples collected since 1991 by the Illinois Department of Public Health, Illinois EPA, and U.S. EPA at residential homes in the Evergreen Manor area subdivisions, the following number of samples were above Maximum Contaminant Levels (MCLs) for public water supply systems as promulgated under the federal Safe Drinking Water Act:

	Samples With Concentrations Above MCL Level	MCL Level
Trichloroethylene (TCE)	237 samples	5 ppb
Perchloroethylene (PCE)	4 samples	5 ppb
1.1.1-Trichloroethane (1.1.1-TCA)	0 samples	200 ppb
TOTAL:	512 samples analyzed	

To our knowledge, TCE has never been used at the Ecolab property -- 1-2 miles northeast of the Evergreen Manor subdivision area. TCE has never been detected in the soil or soil-gas samples on Ecolab's property. In numerous groundwater sampling events by Illinois EPA during 1995-1996, TCE was never detected in groundwater under Ecolab's property. Thus, the proposed site definition should be limited to the areas in Section 29, Township 46 North, Range 2 East where TCE has been detected above Observable Release Criteria or above MCLs. Again, the proposed site definition should not include Ecolab's property.

III. The Agency Should Not Include This Proposed Site On The NPL.

A. Contaminant Concentrations Are Declining.

The test results from samples gathered by the Agency in May 1998 demonstrate that concentrations of TCE and other VOCs in the Evergreen Manor area subdivisions are declining. In some cases, the concentrations are substantially below the concentrations found in the 1991 groundwater sampling events. Yet, the Hazard Ranking System (HRS) scoring evaluation in the referral package submitted by Illinois EPA did not include any of the data from groundwater samples collected by the Illinois Department of Public Health or Illinois EPA in 1996, 1997, 1998 or the data from the samples collected by the Agency itself in 1998.

The enclosed Figure 1 shows the declining concentrations found in the 1998 sampling. In general, TCE and other VOC concentrations have declined more than 75% since 1991. Trends, if any, regarding PCE concentrations are more difficult to establish due to the very low levels of PCE (below applicable Observable Release Criteria) and because early (1991, 1992) monitoring data available from the Agency is absent detection limit information. If PCE detection limits were in the 2-4 ppb range commonly achievable at that time, PCE concentrations are similarly declining.

To be valid, the Hazard Ranking System scoring analysis that underlies the NPL listing decision process should be performed based on the currently available data rather than arbitrarily selected historic data representing 1991 conditions. Given the declining concentrations of TCE, the true HRS score for this proposed "site" should be substantially lower. Accordingly, the Agency should not list this proposed site on the NPL or, at a minimum, should reevaluate the HRS scoring package and the relevant data for proper preparation under the applicable requirements of the National Contingency Plan (NCP) at 40 CFR pt. 300.425, App. A.

B. The NPL Listing Proposal Fails To Comply With The National Contingency Plan By Omitting Publicly Available Data.

As submitted by Illinois EPA, the HRS scoring package failed to consider a substantial volume of relevant and recent publicly available test data about groundwater conditions in the Evergreen Manor area subdivisions. These omissions skew the HRS scoring process in favor of NPL listing, as discussed above. Moreover, these omissions call into question the fundamental integrity of the HRS scoring package in its entirety.

For example, section 3.1.1 of the HRS scoring package states that monitoring well G112 (Sample G112X) (located north of Rockton Road) represents "background" groundwater conditions. Sample G112X from February 1995 (2/23/95) is the only sample from monitoring well G112 included in the HRS scoring package, even though Illinois EPA collected an earlier sample from this same well in March 1994. (Volatile Organics Analysis Data Sheet 3/26/94, attached).

Notably, the 1994 sampling found 8.1 parts per billion (ppb) of 1,1,1-TCA; 3.0 ppb of PCE; and measurable amounts of other VOCs in the groundwater. If the HRS scoring package had followed the NCP rules, this sampling data would be included in the record and "background" conditions would be based on groundwater that contains elevated levels of 1,1,1-TCA and PCE.

The true nature of "background" conditions is critical in establishing the proposed site definition, in evaluating whether an observable release actually has taken place, and in deciding whether or not to list a proposed site on the NPL. Yet, the HRS scoring package currently before the Agency arbitrarily includes one sample from well G112 and excludes another sample from the same well.

It is a fundamental rule of administrative law that the Agency's decision must be based upon -- and cannot simply ignore -- relevant evidence available to the Agency. Without considering any of the 1996, 1997, or 1998 data and by excluding some data from relevant wells, any decision by the Agency to list this proposed site on the NPL would, by definition, be arbitrary and capricious. Accordingly, the Agency should not list this proposed site on the NPL on the basis of the current record.

C. The NPL Listing Proposal Fails To Comply With National Contingency Plan Criteria For Measuring An Observed Release.

Under the National Contingency Plan rules governing the NPL listing process in 40 CFR pt. 300, App. A, groundwater evaluations turn on the definition of Observed Release Criteria in Table 2-3. "The minimum standard to establish an observed release by chemical analysis is analytical evidence of a hazardous substance in the media significantly above the background level." In other words, the Agency cannot rely on sample results that are below these criteria in the NPL listing process. These criteria specifically provide that sample results must be 3 times or more above the "background concentration" to be an "observed release." Sample results that are consistent with background conditions (or within 3 times background conditions) do not amount to an observed release.

In this case, the Agency improperly ignored data about relevant background conditions in section 3.1.1 and elsewhere in the HRS scoring package. For example, the Illinois EPA's 1994 sampling data found 8.1 ppb 1,1,1-TCA and 3.0 ppb PCE in monitoring well G112 north of Rockton Road (although this data was excluded from the HRS scoring package submitted by Illinois EPA). In section 3.1.1 of the HRS scoring package, the Illinois EPA states that this sampling location represents upgradient "background" conditions, but uses the 1995 (and not the 1994) sampling data. If the Illinois EPA had used the 1994 data from well G112, then no results below 24.3 ppb 1,1,1-TCA or 9 ppb PCE would be considered as observed releases under the Observed Release Criteria in the NCP rules. In fact, PCE has never been found above 9 ppb in any groundwater sample collected from a residential well in the Evergreen Manor area subdivisions. Accordingly,

if the 1994 data is considered as the "background" condition, no observable release of PCE is present in the Evergreen Manor area subdivisions for NPL listing purposes.

Moreover, background groundwater conditions contain elevated TCE (several thousand parts per billion) and other volatile organic compounds (VOCs) a few hundred feet east of the Evergreen Manor area at the Hononegah Country Estates subdivision. That area of TCE contamination apparently remains subject to RCRA corrective action under U.S. EPA Administrative Order, Site ILD 006 114 169, Docket No. VW-90-R-06 (Dec. 28, 1989), directed to the Dana Corporation, Warner Electric Division. Likewise, background groundwater conditions contain measurable quantities of TCE and other VOCs approximately one mile north of the Evergreen Manor area near the Goldie Floberg Center at Dorr and Rockton Road. Regional studies have found that approximately 28% of the public water supply wells in Winnebago County had quantifiable levels of at least one VOC. Clarke, R.P. & Cobb, R.P., Winnebago County Groundwater Study, Illinois EPA, Nov. 1988. If the Agency applied these background conditions to the Observed Release Criteria as required by the NCP rules, many of the sample results included in NPL listing's HRS scoring package would have been disregarded entirely.

Because the HRS scoring package that forms the basis for the NPL listing proposal fails to follow NCP rules for determining an observable release of hazardous substances, the Agency should not list this proposed site on the NPL. At a minimum, the Agency should re-score the proposed site under the NCP criteria. Failure to do so, would be arbitrary and capricious and not in accordance with law.

D. The NPL Listing Proposal Fails To Comply With The National Contingency Plan's Requirement For Selection Of A Hazardous Substance.

In addition to the flaws noted above, the HRS scoring package submitted by the Illinois EPA failed to "select the hazardous substance potentially posing the greatest hazard for the pathway (or threat) and use that substance in evaluating the waste characteristics category of the pathway (or threat)" as required by section 2.4.1 of the NCP rules in 40 CFR pt. 300, App. A.

As noted above, TCE is the primary contaminant of concern above MCLs as identified by the Illinois EPA. Yet, the HRS scoring package repeatedly discusses methylene chloride (a common laboratory contaminant), 1,1,1-TCA (never found above MCLs in any samples), PCE (which does not meet the criteria for an observable release), and other VOCs that should have no bearing on the HRS scoring process under the NCP rules. Consistent with the historic data included in the NPL listing referral package , the most recent 5/22/98 sampling data shows only two wells containing PCE greater than the MCL (7 ppb at one location; 7.5 ppb at the other location). As discussed above, both of these results are below the Observed Release Criteria set forth in the NCP rules, so these results cannot properly be considered for NPL listing purposes. Under any analysis, if this Site were evaluated on the basis of PCE alone, it would never be considered for listing on the NPL.

By failing to select TCE as the hazardous substance for purposes of the HRS scoring process and by including a variety of other VOCs that should not included under the NCP rules, the Agency improperly exaggerates the HRS score for this proposed site. Thus, the Agency should refrain from listing this proposed site in the NPL or, at a minimum, should re-score the proposed site under the proper criteria.

E. The NPL Listing Proposal Incorrectly Characterizes 104(e) Responses.

Tab 29 of the referral package includes a "draft" memorandum prepared by Illinois EPA staff purporting to summarize responses to information requests served by the Illinois EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), section 104(e). Inclusion of a "draft" memorandum dated May 28, 1997 in a referral package assembled more than one year later is, at best, procedurally flawed. Nonetheless, the "draft" memorandum's inclusion in the referral package compels this response.

The "draft" memorandum speculates that an "odor" at Ecolab's property mentioned in a memorandum from the 1970s may be due to volatile organics, rather than the more likely odors associated with soap production at Ecolab's facility before 1974. This speculation is not based on any first-hand knowledge and is squarely contradicted by the factual information Ecolab submitted to the Illinois EPA before the "draft" memorandum was prepared.

The "draft" memorandum further suggests that monitoring well 103 (adjacent to the former railroad bed along Ecolab's property) contained "the highest" readings of monitoring wells for 1,1,1-TCA and PCE. This suggestion is misleading. In fact, the highest reading of 1,1,1-TCA found in well 103 is 16 ppb -- ten times below the MCL (200 ppb) level that EPA regulations define as safe to drink. None of the 512 samples collected found 1,1,1-TCA above MCLs at the Evergreen Manor subdivisions. Thus, the Illinois EPA's inflammatory statements about 1,1,1-TCA are irrelevant to and should not be included the NPL listing process. Moreover, monitoring wells on the other side of Rockton Road north of and upgradient from Ecolab found elevated 1,1,1-TCA (8.1 ppb in well G112; and 3.0 ppb in well G114). Given the groundwater flow direction toward Ecolab, it is likely that the 1,1,1-TCA detected in wells G112 and G114 flowed underneath Ecolab's property to impact well 103.

The highest reading of PCE found in well 103 is 17 ppb (or an estimated value of 43 ppb in the 1995 sampling event), which is generally consistent with levels of PCE found in regional groundwater conditions. Again, PCE has been found above MCLs in fewer than 1% of the samples (4 out of 512 samples) gathered at the Evergreen Manor subdivisions (and in none of the residential well samples above the NCP's Observed Release Criteria). As with 1,1,1-TCA, the monitoring wells on the other side of Rockton Road north of and upgradient from Ecolab contained elevated levels of PCE (3.0 ppb in well G112; and 0.8 ppb in well G114). Given the groundwater flow direction toward Ecolab, it is likely that the PCE detected in wells G112 and

G114 flowed underneath Ecolab's property to impact well 103. The misleading statements about substances other than TCE in the tab 29 memorandum are irrelevant and improper.

The misleading statements in tab 29 are even more troubling given the Illinois EPA's failure to serve section 104(e) information requests on many potentially responsible parties. Numerous open gravel pits are used as construction debris disposal sites in the area. To this day, a sign at the Kelley Sand & Gravel pit directly adjacent to the impacted residential wells reads "Dump Over The Bank." As early as 1974, the Illinois EPA found improper dumping in this gravel pit. Given the large landfill at Prairie Hill Road and Highway 251 formerly operated by the City of Beloit, WI and the numerous unlicensed dumps that have operated in the general area, the Illinois EPA's failure to investigate these potential sources makes the administrative record fundamentally flawed and not in accordance with the NCP rules relating to "source" characterization.

F. Other Approaches Are Available.

After reviewing the above flaws in the NPL listing proposal, it appears the Illinois EPA and the Agency may have arbitrarily singled out this proposed site for listing on the NPL as a mechanism to garner funding to develop a water supply system for the Evergreen Manor area subdivisions. By letter dated April 14, 1997, the Illinois Attorney General's Office wrote that placing the proposed site on the NPL "is now its only option which will allow for the provision of a permanent public water supply for the affected residents." Groundwater studies in Winnebago County have long shown that the groundwater is susceptible to nitrate contamination and other impacts. The use of septic tank disposal systems in the residential subdivisions may have elevated these risks. Given the concerns associated with groundwater conditions in Winnebago County, the desire to address these concerns is understandable.

Nonetheless, the Agency should not misuse the NPL listing process to address concerns that perhaps should have been addressed during the ordinary development approval process for the Evergreen Manor area subdivisions. In general, water supply system expansions in rural Illinois have developed with funding from sources other than the "Superfund," such as state or county drinking water or economic development grants and loans. In February 1991, the Illinois Department of Public Health recommended a much simpler approach to this proposed site than the complicated NPL process now under consideration. (attached as Exh. 1 to Ecolab's Sept. 22, 1997 submittal). We understand that the Agency is evaluating an Engineering Evaluation/Corrective Action that might eliminate the need to list this site on the NPL. Rather than pursue the complicated NPL process, other approaches should be seriously considered.

IV. Ecolab Incorporates Its Prior Submittals to Illinois EPA and U.S. EPA.

Ecolab's submittals to the Illinois EPA dated January 31, 1997 and September 22, 1997 included technical reports prepared by Conestoga-Rovers & Associates (CRA) entitled Contaminant

Source Evaluation (Jan. 1997) and Groundwater Flow Analysis Report (Sept. 1997) as well as factual information about Ecolab. These submittals contain data verifying that Ecolab did not contribute to the TCE and other VOC contamination detected at the Evergreen Manor subdivision areas.

In a letter sent by fax on September 15, 1998, David Evans, Director, State, Tribal and Site Identification Center, U.S. EPA extended the comment period for this site until October 12, 1998. Accordingly, these Comments are timely submitted. As part of its Comments, Ecolab encloses and incorporates complete copies of these submittal packages and asks that this information be carefully considered by the Agency and included in the administrative record.

V. Conclusion.

From the earliest samples collected by the IDPH in 1990, TCE always has been the contaminant of concern in the Evergreen Manor area subdivisions. The Agency's NPL listing decision should focus on a proposed site definition limited to those areas in Section 29 where TCE actually exists above Observed Release Criteria. Given the declining concentrations of TCE and other reasons discussed above, NPL listing is not warranted for this site. At a minimum, the HRS scoring should be performed properly utilizing current data before any listing decision is made.

Ecolab never used TCE. TCE has never been detected in soil or soil-gas samples on Ecolab's property. In numerous groundwater samples gathered by Illinois EPA during 1995 and 1996, TCE was never found in groundwater on Ecolab's property. Accordingly, Ecolab is not an owner, operator, or person who arranged for the disposal of hazardous substances that resulted in a release or threatened release of TCE within the meaning of Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act. As a result, any listing decision or other Agency action that refers to Ecolab as a potentially responsible party would be arbitrary and capricious.

Sincerely,

Steven M. Christenson

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Enclosures:
1. Figure 1, Concentration Through Time
2. Volatile Organics Analysis Data Sheet, Well G112 (Mar. 26, 1994)
3. Ecolab Submittal Package (Jan. 31, 1997)
4. Ecolab Submittal Package (Sept. 22, 1997)

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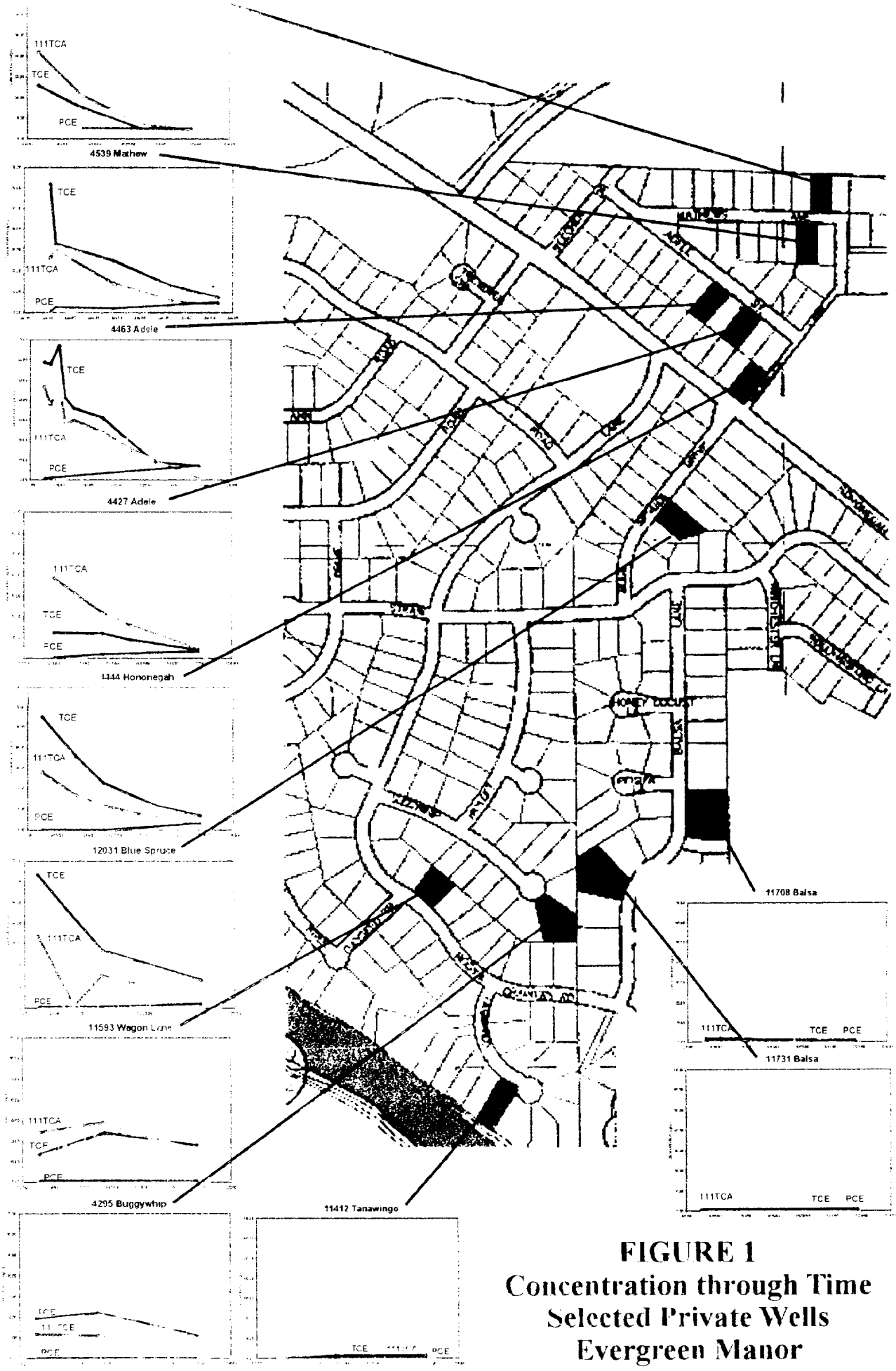

FIGURE 1
Concentration through Time
Selected Private Wells
Evergreen Manor

Source: May 1998 Sampling Data

1A

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

G112

Lab Name: ARDL, INC. Contract: EVERGREEN MR

Lab Code: --- Case No.: --- SAS No.: --- SDG No.: G107D

Matrix: (soil/water) WATER Lab Sample ID: 2291-7

Sample wt/vol: 25.0 (g/ml) ML Lab File ID: >T2672

Level: (low/med) LOW Date Received: 3/26/94

% Moisture: not dec. --- Date Analyzed: 4/05/94

Column: (pack/cap) CAP Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
75-71-8	Dichlorodifluoromethane	.6	U
74-87-3	Chloromethane	.8	U
75-01-4	Vinyl Chloride	.5	U
74-83-9	Bromomethane	.9	U
75-00-3	Chloroethane	1.0	U
75-69-4	Trichlorofluoromethane	.8	U
75-35-4	1,1-Dichloroethene	.6	U
75-09-2	Methylene Chloride	2.0	
156-60-5	trans-1,2-Dichloroethene	.4	U
75-34-3	1,1-Dichloroethane	2.1	
594-20-7	2,2-Dichloropropane	.6	U
156-59-2	cis-1,2-Dichloroethene	2.2	
74-97-5	Bromochloromethane	.7	U
67-66-3	Chloroform	.4	U
71-55-6	1,1,1-Trichloroethane	8.1	
563-58-6	1,1-Dichloropropene	.6	U
56-23-5	Carbon Tetrachloride	.4	U
71-43-2	Benzene	.4	U
107-06-2	1,2-Dichloroethane	.3	U
79-01-6	Trichloroethene	.5	U
78-87-5	1,2-Dichloropropane	.3	U
75-27-4	Bromodichloromethane	.4	U
74-95-3	Dibromomethane	.4	U
10061-01-5	cis-1,3-Dichloropropene	.3	U
108-88-3	Toluene	.4	U
10061-02-6	trans-1,3-Dichloropropene	.3	U
79-00-5	1,1,2-Trichloroethane	.4	U
127-18-4	Tetrachloroethene	3.0	
142-28-9	1,3-Dichloropropane	.3	U
124-48-1	Dibromochloromethane	.4	U
106-93-4	1,2-Dibromoethane	.3	U
108-90-7	Chlorobenzene	.4	U
630-20-6	1,1,1,2-Tetrachloroethane	.4	U
100-41-4	Ethylbenzene	.4	U

1A-2

VOLATILE ORGANICS ANALYSIS DATA SHEET

EPA SAMPLE NO.

G112

Lab Name: ARDL, INC. Contract: EVERGREEN MR

Lab Code: --- Case No.: --- SAS No.: --- SDG No.: G107D

Matrix: (soil/water) WATER Lab Sample ID: 2291-7

Sample wt/vol: 25.0 (g/ml) ML Lab File ID: >T2672

Level: (low/med) LOW Date Received: 3/26/94

% Moisture: not dec. --- Date Analyzed: 4/05/94

Column: (pack/cap) CAP Dilution Factor: 1.0

CAS NO.	COMPOUND	CONCENTRATION UNITS: (ug/L or ug/Kg) UG/L	Q
108-38-3	m & p-Xylene	.8	U
95-47-6	o-Xylene	.4	U
100-42-5	Styrene	.4	U
75-25-2	Bromoform	.5	U
98-82-8	Isopropylbenzene	.3	U
79-34-5	1,1,2,2-Tetrachloroethane	.4	U
108-86-1	Bromobenzene	.5	U
96-18-4	1,2,3-Trichloropropane	.4	U
103-65-1	n-Propylbenzene	.4	U
95-49-8	2-Chlorotoluene	.4	U
106-43-4	4-Chlorotoluene	.4	U
108-67-8	1,3,5-Trimethylbenzene	.4	U
98-06-6	tert-Butylbenzene	.4	U
95-63-6	1,2,4-Trimethylbenzene	.4	U
135-98-8	sec-Butylbenzene	.5	U
99-87-6	p-Isopropyltoluene	.4	U
541-73-1	1,3-Dichlorobenzene	.5	U
106-46-7	1,4-Dichlorobenzene	.5	U
95-50-1	1,2-Dichlorobenzene	.5	U
104-51-8	n-Butylbenzene	.5	U
96-12-8	1,2-Dibromo-3-chloropropane	.7	U
120-82-1	1,2,4-Trichlorobenzene	.5	U
87-68-3	Hexachlorobutadiene	.6	U
91-20-3	Naphthalene	.7	U
87-61-6	1,2,3-Trichlorobenzene	.5	U